

Remarks

Claims 1-11 are pending in the application. All claims are rejected. All rejections are respectfully traversed.

Claims 1-4 and 6-9 are rejected under 35 U.S.C. 102(e) as being anticipated by Ayyagari et al., U.S. Patent Application No. 09/784,474 (Ayyagari).

Ayyagari's invention stops where Applicant's invention starts. In fact, one of the objectives of Applicant's invention is to overcome the limitations of Ayyagari's invention, see paragraph 3 on page 5 and paragraph 2 on page 6 of the Applicant's original specification.

For example, in paragraph 2 on page 6 Applicant states: "control points in those networks are not portable, and cannot be handheld." Clearly, the proxy bridge 205 of Ayyagari's invention would benefit from Applicant's invention.

The Examiner heavily relies on the description of a conventional computer system described by Ayyagari to reject the Applicant's invention. This comes from the fact that the Examiner simply ignores some of Applicant's claims' limitations. For example, cited Fig.1 is "a block diagram generally illustrating an exemplary computer system on which the present **invention may reside**" (emphasis is added by the Applicant). As we show below in greater details, the Applicant's invention is not a general computer system.

Regarding claim 1, the Examiner states that “a base set, connected to the wired network, including a first part of a UPnP stack” is a “communications media” which is a part of the conventional computer system and is, e.g., “wired media such as a wired network”. Applicant assures the Examiner that a base set is not a “wired network”, but only connected to the wired network. Also, the “first part of a UPnP stack” element is completely ignored by the Examiner and not described in the cited prior art.

The Examiner goes even further stating that “a control set, connected to the base set by a communications link, including a second part of the UPnP stack and a graphical user interface” is “a monitor 191”, which is a conventional monitor or output device.

It is well known that monitors can only display. Monitors **do not include computational elements**, and most certainly monitors **never include any parts of a UPnP stack**. Monitors simply display pixels. Those of ordinary skill in the art would understand that monitors do not include communication protocol stacks as claimed. Again, the essential part of Applicant’s invention, the “second part of the UPnP stack” is ignored by the Examiner. The Examiner fails to provide any support for why conventional monitors have the “second part of the UPnP stack.”

The comparison of “a control set” with a conventional monitor cannot anticipate the wireless communication link as in claim 2, and the wireless communication link, including Bluetooth, Home RF, IEEE802.11a, or IEEE802.11b as in claim 3. According to the Examiner, the Ayyagari

teaches how to connect a conventional monitor with something else using wireless link, including Bluetooth, Home RF, IEEE802.11a, or IEEE802.11b technology. However, in support of that statement the Examiner cited just some other reference to the wireless technology. However, in order to analyze differences between prior art and claimed invention the claimed invention as a whole must be considered. The Examiner must provide a reference that describes a monitor connected to a wireless network, or withdraw the rejection.

As to claim 4, a monitor 191 is not a control set, the limitation ignored by the Examiner, and moreover the monitor 191 is not a wireless control set.

The Examiner states for claims 6 and 7 that it is inherent in a monitor structure to be powered by battery. In actuality, monitors are usually powered by AC power. Nevertheless, the Applicant's control set is not a monitor.

As per claim 8, the Examiner again relies on definition of conventional computer system ignoring the wording and limitations of the claim. For example, Applicant's claim states communication should be done "...over a wireless link having a highest signal strength". This cannot be anticipated by the technical definition of the term "modulated data signal" or the description of what communications media typically employ. Neither a base set nor multiple instances of the base set nor communications with a base set over a wireless link having highest signal strength are taught by Ayyagari.

As per claim 9, the Examiner again ignores most of the claim's limitations. Neither "the first part of the UPnP stack" nor "addressing, discovery, description, eventing and control layers" are addressed by the Examiner. With all due respect, the Applicant reminds the Examiner that, according MPEP 2106 II, "USPTO personnel should state all reasons and bases for rejecting claims in the **first Office action**. Deficiencies should be explained clearly, particularly when they serve as a basis for a rejection." Failure to do so, not only leads to unnecessary delays in the prosecution, but prevents Applicant from arguing the novelty of his invention.

Claims 5 and 10-11 are rejected under 35 U.S.C. 103(a) as being unpatentable over Ayyagari and further in view of Gajdos et al., Lund Institute of Technology, 2000 (Gajdos).

Gajdos is a reference cited by the Applicant at page 6 to illustrate the necessity and objectives of the current invention.

Again, as explained above, combination of Ayyagari and Gajdos fails to teach the wireless control set as in claim 5.

As for claims 10 and 11, as stated in the Applicant's original specification, Gajdos implements the entire UPnP protocol stack on a device such as a mobile phone. That limitation is one of many the Applicant's invention is designed to overcome. In Applicant's invention, the UPnP protocol stack is separated into a first part in the base and a second part in the control sets. That explains why Gajdos does not cure the deficiencies of Ayyagari.

It is believed that this application is now in condition for allowance. A notice to this effect is respectfully requested. Should further questions arise concerning this application, the Examiner is invited to call Applicant's attorney at the number listed below. Please charge any shortage in fees due in connection with the filing of this paper to Deposit Account 50-0749.

Respectfully submitted,
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